REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IV

EPA ID: GAD981275993 **Site Name:** MILLIKEN AND COMPANY **State ID:**

Alias Site Names:

City: LAGRANGE

Refer to Report Dated: 9/24/2010 **County or Parish:** TROUP **State:** GA

Report Developed By: STATE **Report Type:** SITE INSPECTION 001

[X] **1. Further Remedial Site Assessment Under CERCLA (Superfund) is not required because:**

NFRAP-Site does not qualify for the NPL based on existing information

[ ] **2. Further Assessment Needed Under CERCLA:**

Discussion/Rationale:

The U.S. Environmental Protection Agency (EPA) has determined that no further remedial action by the Federal Superfund program is warranted at the referenced site, at this time. The basis for the no further remedial action planned (NFRAP) determination is provided in the attached document. A NFRAP designation means that no additional remedial steps under the Federal Superfund program will be taken at the site unless new information warranting further Superfund consideration or conditions not previously known to EPA regarding the site are disclosed. In accordance with EPA's decision regarding the tracking of NFRAP sites, the referenced site may be removed from the CERCLIS database and placed in a separate archival database as a historical record if no further Superfund interest is warranted. Archived sites may be returned to the CERCLIS site inventory if new information necessitating further Superfund consideration is discovered.

See the attached memo, dated 11-18-11, from Donna Seadler, RPM, which details the analysis of the data gathered during the SI and provides the basis for the NFRAP decision.

Site Decision Made by: DONNA K. SEADLER, RPM

Donna K. Seadler

Digitally signed by Donna K. Seadler
DN: cn=Donna K. Seadler, o=Superfund Division, ou=Site Evaluation Section, email=seadler.donna@epa.gov, c=US
Date: 2011.11.18 13:21:59 -05'00'

Signature: _____ **Date:** 11/18/2011

EPA Form # 9100-3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

November 18, 2011

MEMORANDUM

SUBJECT: Milliken Site Inspection - Analysis of sampling results and justification for no further response action planned (NFRAP) decision

FROM: Donna K. Seadler, Remedial Project Manager
Superfund Site Evaluation and Remedial Branch

TO: Site File

BACKGROUND

The September 24, 2010 Site Inspection (SI) report for the Milliken facility in La Grange, GA was prepared by GA EPD. Using the CERCLA Hazard Ranking System (HRS), GA EPD recommends that the site be evaluated further, based on a strict use HRS scoring. However, after analysis of the data, EPA does not concur with this conclusion.

The data from the Milliken SI show numerous locations where constituents were detected at elevated levels (with "elevated" defined in the HRS as 3 times above background). A sample may be considered elevated under this definition, but still be well below EPA screening values. Of the samples with elevated results, there are far fewer locations with results above EPA screening levels. Screening values are not indicative of risk nor are they cleanup values. They are conservative values used for screening purposes to determine whether there may be a need for additional evaluation.

The SI report prepared by GA EPD marked in bold all sample results which were above screening levels. However, the sample results marked in bold were compared with residential screening levels. Because this is an operating facility with controlled access, industrial screening levels should be used for screening of on-site samples with residential levels used for off-site samples.

The following is an analysis of each table in the SI which shows sampling results.

ANALYSIS OF SAMPLING RESULTS

TABLE 2 – Waste Analytical Results

This table was generated simply to show the profile of the waste solids and liquids on-site. No environmental media were included, and background levels and screening levels are not applicable.

TABLE 3 – Surface Soil Analytical Results

At STA-20, benzo(a) pyrene was detected at 1.2 mg/kg which is below the industrial soil screening level of 2.1 mg/kg. Aldrin was detected at .11 mg/kg, which exceeds the industrial soil screening level of .10 mg/kg by 10%. This is an isolated detection and is not significant.
At STA-22, -25, -26, and 27, arsenic was detected at levels ranging from 11 to 24 mg/kg with an industrial soil screening level of 1.6 mg/kg. These detections are all on-site in the area of the firewater pond, except for STA-25, which is residential. EPA's industrial Removal Action Level (RAL) is 117 mg/kg. The residential RAL is 39 mg/kg. All arsenic detections were below the residential RAL.

TABLE 4 – Subsurface Soil Analytical Results

There were no detections above residential or industrial screening levels in these samples.

TABLE 9 – Stream Surface Water Analytical Results

At STA-02 and -03, detections of aluminum slightly exceeded the Acute Surface Water Screening Values but STA-03 is slightly upstream along Blue John Creek. Sampling location STA-03 was chosen specifically to determine whether contaminants were attributable to activities along Blue John Creek. While aluminum was detected in the fire pond on-site (See TABLE 13), the background sample at Granger Park Pond also contained elevated aluminum levels.

TABLE 10 – Stream Sample Analytical Results

At STA-02 duplicate, dieldrin was detected at .00036 mg/kg which is slightly above the .0033 mg/kg sediment screening level. This is not consistent with the other sample results of the sediments along the surface water pathway. If this were attributable to the site, one would expect to see dieldrin in other sampling points along the overland run-off route (OROR) or within the stream. Instead, they only appear at STA-11 on-site, and this location one mile distance away. The remainder are mostly non-detect, with a few below screening levels.

TABLE 11 – Stream Surface Water Analytical Results

At STA-07, aluminum was detected at a level greater than the acute freshwater screening value. This sampling location is not attributable to the site and was chosen specifically to determine what contaminants in the surface water pathway may be coming from the Atlanta Branch direction of the surface water pathway.

At STA -06, -08, -09, and -10, iron was detected at levels greater than the chronic freshwater screening value. Because STA-06 is not attributable to the site and all detections in the surface water pathway, even those not attributable to the site, are near the chronic freshwater screening value, the iron levels in the surface water pathway do not appear to be caused by operations at the Milliken Site.

TABLE 12 – Stream Sample Analytical Results (OROR)

At STA-04, magnesium was detected at 130 mg/kg, which is greater than the 30.2 mg/kg sediment screening value. This sample was more than a half of a mile downstream from the facility, following the addition of 3 other streams to the surface water pathway. There was no trend of magnesium detections between the facility and this sampling point to indicate that magnesium may be a concern.

TABLE 13 – Fire Pond Surface Water Analytical Results

Aluminum and iron were detected at greater than the chronic freshwater screening levels. However, the iron and aluminum levels were 3 times higher in the background sample at the Granger Park Pond, therefore these detections cannot be definitively attributed to site operations.

TABLE 14 – Fire Pond Sediment Analytical Results

Copper was detected at greater than the sediment screening values in STA-11, STA-12 and the background sample at STA-13. These minor exceedances were also present in the background sample.

At STA-11, benzo (a) pyrene, fluoranthene and pyrene were detected at levels ranging from 2.6 to 3.5 mg/kg, which exceed the sediment screening values of .33 mg/kg by an order of magnitude.

At STA-11, Pesticide 44-DDT was detected at a level of .074 mg/kg, which exceeds the sediment screening value of .0033 by an order of magnitude. Pesticide dieldrin was detected at .035 mg/kg, exceeding the sediment screening value of .0033 by an order of magnitude. There were no detections of these pesticides at STA-12, and minor detections at other locations. These pesticides were heavily used in the past and these isolated exceedances on an industrial facility are expected.

CONCLUSIONS

Except for a single residential sample, the only constituents found at greater than the industrial screening levels were on-site at the still-operating facility. The residential sample was well below the residential removal action level. The sample results at STA-11 had the greatest number of exceedances of screening values. This location was at the fire pond nearest the major production activities at the facility, in area of restricted access.

In summary, the constituents found during the Milliken SI sampling are consistent with what would be found in an area with a history of multiple industrial operations. There are low levels of a variety of constituents found at varied locations in several media which appear to originate with multiple sources. Based on the data available at this time, no further response action is planned under CERCLA.